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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING TIME FOR  
GOOGLE TO SUBMIT OPPOSITION TO  
PLAINTIFFS' MOTION FOR LEAVE TO  
AMEND COMPLAINT (DKT. 395) AND  
DECLARATION IN SUPPORT OF  
PLAINTIFFS' MOTION TO SEAL (DKT.  
394)**

Judge: Honorable Yvonne Gonzalez Rogers

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on February 3, 2022, Plaintiffs filed their Administrative Motion To Consider Whether Portions Of Motion for Leave To Amend Complaint Should Be Sealed (“Motion to Seal”) (Dkt. 394) and their Motion for Leave To Amend Complaint (“Motion for Leave”) (Dkt. 395);

WHEREAS, on February 3, 2022, Google received unredacted copies of Plaintiffs’ Motion for Leave and exhibits, approximately 43 of which were designated to be sealed and submitted with Dkts. 394, 395;

WHEREAS, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, the current deadline for Google to respond to the Motion for Leave (Dkt. 395) is by Thursday, February 17, 2022;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the Designating Party to Plaintiffs’ Motion to Seal (Dkt. 394), to establish that such designated material is sealable, is by Thursday, February 10, 2022;

WHEREAS, the Parties agree that an extension of time of 8 days will provide Google with sufficient time to respond to the Motion for Leave (Dkt. 395);

WHEREAS, the Parties agree that an extension of time of 7 days will provide Google with sufficient time to submit its declaration in support of Plaintiffs’ Motion to Seal (Dkt. 394);

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 394), to February 17, 2022, and the deadline by which Google shall submit its response to Plaintiffs’ Motion for Leave (Dkt. 395), to February 25, 2022.

DATED: February 8, 2022

QUINN EMANUEL URQUHART &  
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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT (DKT. 395) AND DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 394). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: February 8, 2022

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

*Counsel on behalf of Google*

~~[PROPOSED]~~ ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 394), shall be extended to February 17, 2022, and the deadline for Google to submit its response to Plaintiffs' Motion for Leave (Dkt. 395), shall be extended to February 25, 2022.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: February 16, 2022

  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge